

July 5, 2019

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**RE: South Carolina Energy Freedom Act (H. 3659) Proceeding Initiated Pursuant to S.C. Code Ann. Section 58-40-20(C): Generic Docket to (1) Investigate and Determine the Costs and Benefits of the Current Net Energy Metering Program and (2) Establish a Methodology for Calculating the Value of the Energy Produced by Customer-Generators**

**Duke Energy Carolinas, LLC and Duke Energy Progress, LLC Comments on Procedural Schedule**

**Docket No. 2019-182-E**

Dear Ms. Boyd,

Pursuant to the Commission Directive, dated June 26, 2019, in Docket No. ND-2019-11-E., Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” and together with DEC, the “Companies” or “Duke”) are hereby providing the Commission with comments related to the procedural schedule of the above-referenced docket. The Companies have also attached to this letter a table outlining their proposed procedural approach in all recently-opened dockets implementing Act 62.

S.C. Code Ann. § 58-40-20(C) requires the Commission to open a docket by January 1, 2020 to investigate and determine the costs and benefits of the current net energy metering program and establish a methodology for calculating the value of the energy produced by customer generators. The Commission has satisfied this requirement by opening the above-referenced docket. The Companies agree with position of Dominion Energy South Carolina, Inc. in its July 5, 2019 letter filed in the above-referenced docket, that no further action needs to occur in implementing Section 58-40-20 prior to January 2021. The Companies also agree that the time period between January 2021 and June 1, 2021, the date on which the “solar choice metering tariff” goes into effect, is adequate to allow for sufficient notice and opportunity for public comment and hearing for the establishment of the solar choice metering tariff.

The Honorable Jocelyn G. Boyd  
July 5, 2019  
Page 2

Should the Commission desire to require anything other filings this year, the Companies note that they find merit in the proposal submitted on July 3, 2019, by Vote Solar for technical workshops or other informal collaborative stakeholder processes to be held prior to establishing a litigation schedule. In particular, the Companies note that, based on the preliminary information provided in Vote Solar's July 3, 2019 letter, its technical workshop proposal is procedurally and substantively appropriate, and does not raise due process concerns, because the proposal does not preclude the parties from later presenting evidence and participating in an evidentiary hearing on these issues.

Should the Commission desire to take any action on this matter prior to January 1, 2021, the Companies propose that the Commission take comments from interested parties on Vote Solar's proposed procedural schedule by December 2, 2019 for further Commission action. The Companies are hopeful that interested parties can find a collaborative path similar to that which occurred under Act 236 of 2014 when the original net metering tariffs were established through Docket No. 2014-246-E. Given the other near-term deadlines under Act 62, the Companies propose that comments, and a report on the status of any agreement on a procedural schedule related to the solar choice metering tariffs be due from the parties by December 2, 2019.

Should you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,



Rebecca J. Dulin

Attachment

cc: Andrew M. Bateman, Office of Regulatory Staff  
Nanette S. Edwards, Office of Regulatory Staff  
Jeffrey M. Nelson, Office of Regulatory Staff  
Becky Dover, SC Department of Consumer Affairs  
Carri Grube-Lybarker, SC Department of Consumer Affairs  
Heather Shirley Smith, Duke Energy Corporation  
K. Chad Burgess, Dominion Energy South Carolina, Inc.  
Matthew W. Gissendanner, Dominion Energy South Carolina, Inc.

**Duke Energy Carolinas, LLC and Duke Energy Progress, LLC  
Proposed Procedural Schedule**

<b>Docket Number</b>	<b>Docket Description</b>	<b>Procedural Schedule/Notes</b>
2019-185-E (DEC) 2019-186-E (DEP)	Proceeding to Establish Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)	<u>DEC/DEP Direct Testimony</u> (on the standard offer, avoided cost methodology, form contract power purchase agreements, and commitment to sell forms): August 14, 2019 <u>Intervenor/ORS Direct Testimony</u> : September 11, 2019 <u>DEC/DEP Rebuttal Testimony</u> : October 2, 2019 <u>Intervenor/ORS Surrebuttal Testimony</u> : October 11, 2019 <u>Hearing</u> : Week of October 21, 2019
2019-195-E (DEC) 2019-196-E (DEP)	Proceeding for the Commission to Establish Reasonable Guidelines to Ensure Reasonable Interconnection Timelines, Including Time Requirements to Deliver a Final System Impact Study to All Interconnection Customers that Execute a System Impact Study Agreement - S.C. Code Ann. Section 58-27-460-(D)	The Commission should request comment from interested parties by December 2, 2019.
2019-207-E (DEC) 2019-208-E (DEP)	Proceeding Related to S.C. Code Ann. Section 58-41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required By the Commission	DEC and DEP will file a letter with the Commission by August 2, 2019 notifying the Commission as to whether the Companies have a voluntary renewable energy program on file that conforms with the requirements of S.C. Code Ann. § 58-41-30. After reviewing this filing, which will address the Companies' voluntary renewable energy program pending in Docket No. 2019-320-E, the Commission should consider further a procedural schedule.
2019-210-E (DEC) 2019-211-E (DEP) 2019-180-E (generic)	Proceeding for the Commission to Review the Community Solar Programs Established Pursuant to Act 236 of 2014 and to Solicit Status Information on Existing Programs from the Electrical Utility S.C. Code Ann. Section 58-41-40 (B)(1)	DEC and DEP will file a report with the Commission by July 18, 2019 outlining the Companies' existing community solar programs and proposing any new community solar programs. The Commission should require updated reports on existing community solar programs and any proposals for new community solar programs by Dec. 9, 2019.
2019-182-E (generic)	Proceeding Initiated Pursuant to S.C. Code Ann. Section 58-40-20(C) to (1) Investigate and Determine the Costs and Benefits of the Current Net Energy Metering Program and (2) Establish a Methodology for Calculating the Value of the Energy Produced by Customer-Generators	No immediate further action is required by Act 62. DEC/DEP propose that Parties file with the Commission comments on a schedule and use of Technical Workshops proposed by Vote Solar by Dec. 2, 2019 for further Commission consideration and encourage interested parties to discuss and agree, if possible, on a schedule prior to the Dec. 2, 2019 filing.
2019-224-E (DEC) 2019-225-E (DEP)	Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans	DEC and DEP will file updated IRPs this fall as scheduled and comprehensive IRPs compliant with Act 62 on Sept. 15, 2020. No rulemaking is required under Act 62 and it is premature to require one before the utilities are allowed to file IRPs compliance with Act 62.